Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless 955 Water Street Kerrville, Texas 78029

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 – 12th Street, S.W. Washington, D.C. 20554

Re: WT Docket No. 01-309
HAC Digital Wireless Telephones

Second Semi-Annual Report

Dear Ms. Dortch:

The Filer, Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless, is the licensee of Cellular Radiotelephone Service Station KNKN691. This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's Report and Order (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background information, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer provides Frequency Block B cellular service to the B2 Segment of the Texas 15 - Concho RSA. The digital portion of the Filer's wireless system employs the Time Division Multiple Access ("TDMA") air interface. The Filer currently markets five models of TDMA digitial wireless telephones, of which the following three provide some measure of protection for hearing aid users through either some inductive coupling capability or potentially lower levels of interference with hearing aids: A) Motorola Model V60i; B) Motorola Model C330; and C) Nokia Model 6360. Upon information and belief, none of these units meets a U3 or U3T rating under ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility ("HAC") requirements of the <u>R&O</u>, the Filer is literally at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly, must rely on the manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

- Item 1 -- Digital Wireless Phones Tested: The Filer has not tested any digital wireless telephones for HAC compliance. All testing will be done by the handset manufacturers.
 - Item 2 -- Laboratory Used: None. See Response to Item 1.
- Item 3 -- Test Results For Each Phone Tested: Not applicable. See Response to Item 1.
- Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19: Upon information and belief, none of the handsets marketed by the Filer meets a U3 or U3T rating under ANSI Standard C63.19.
- Item 5 -- Report On The Status Of Product Labeling: None. It is anticipated that product labeling will be handled by the handset manufacturers.
- Item 6 -- Report On Outreach Efforts: The Filer is developing a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs.
- Item 7 -- Information Related To Retail Availability of Compliant Phones: Upon information and belief, there are currently no handsets commercially available that meet a U3 or U3T rating under ANSI Standard C63.19.
- Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.
- Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None.
- Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: Upon information and belief, there are currently no handsets commercially available that meet a U3 or U3T rating under ANSI Standard C63.19. As noted in the second paragraph of this report, the Filer markets five models of digital wireless telephones; and, upon information and belief, none of these models meet a U3 or U3T rating under ANSI Standard C63.19.

Item 11 - Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: Interoperability testing will be performed by the handset manufacturers.

Very truly yours,

Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless

Dated: 11/11/04

General Manager

In accordance with Rule Section 1.12, please refer any inquiries or correspondence

Robert M. Jackson Blooston, Mordkofsky, Dickens, Duffy & Prendergast 2120 L Street, N.W. Suite 300 Washington, D.C. 20037 Tel.: 202-828-5515

FAX: 202-828-5568

E-mail: rmj@bloostonlaw.com